

FILED

OCT 05 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

STEPHEN C. WILLIAMS
U.S. MAGISTRATE JUDGE
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

CASE NUMBER 18-mj-7158-SCW

ALGERNON C. PERKINS,)

Defendant.)

Title 18, United States Code
Section 1951

CRIMINAL COMPLAINT

I, Matthew Inlow, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

COUNT 1

INTERFERENCE WITH COMMERCE BY ROBBERY

On or about the 7th of September, 2018, in Marion County, Illinois, within the Southern District of Illinois,

ALGERNON C. PERKINS,

defendant herein, did unlawfully take and obtain personal property consisting of United States currency from the person or presence of the employee of the Cash Store, the owner of the currency and a business that engages in interstate commerce, against the employee's will by means of actual and threatened force, violence, and fear of injury to the employee by holding a pistol to the back of the employees head and threatening to shoot her.

All in violation of Title 18, United States Code, Section 1951.

COUNT 2

INTERFERENCE WITH COMMERCE BY ROBBERY

On or about the 29th of September, 2018, in Madison County, Illinois, within the Southern District of Illinois,

ALGERNON C. PERKINS,

defendant herein, did unlawfully take and obtain personal property consisting of United States currency from the person or presence of the employee of the Cash Store, the owner of the currency and a business that engages in interstate commerce, against the employee's will by means of actual and threatened force, violence, and fear of injury to the employee by holding a pistol to the employee's back.

All in violation of Title 18, United States Code, Section 1951.

AFFIDAVIT

I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) United States Department of Justice since September of 2001. I am currently assigned to the Fairview Heights Field Office in Illinois. Prior to becoming an agent with ATF, I was a Uniformed Division Officer with the United States Secret Service. I investigate crimes of violence and drug crimes that are in violation of Titles 18 and 21 of the United States Code of Federal law in the Southern District of Illinois. The statements contained in this affidavit are based on the investigation of your Affiant, as well as information derived from reports and interviews of the

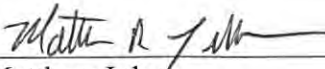
law enforcement officers and witnesses named herein. In support of this Complaint, your Affiant states as follows:

- 1) On September 7, 2018 at approximately 11:43 a.m., M.P. worked alone at the Salem, Illinois Cash Shop. The Cash Shop is located at 103 Baldrige Lane, #101 in Salem, Illinois within Marion County within the Southern District of Illinois.
- 2) M.P. reported to law enforcement that a black male wearing a t-shirt, jeans, and a ball cap entered the store. The black male held a handgun and placed it to the back of M.P.'s head. The black male told M.P. to open the drawers and the safe and empty all of the money into the bag. The black male told M.P. if she moved her head, he would shoot her in the head and face. The black male led M.P. into a bathroom where M.P. pressed the panic button. Over seven thousand dollars was taken.
- 3) When law enforcement arrived, M.P. required several minutes to calm down sufficiently for law enforcement to talk with M.P. regarding the armed robbery.
- 4) Salem police officers obtained video surveillance from the local Kentucky Fried Chicken. On September 7, 2018, a black male wearing jeans, a t-shirt, and a ball cap entered the Kentucky Fried Chicken, according to the time set on the video recording, at 11:20 a.m. The black male's jeans are distinctive with ripped upper thighs and a crease pattern below the upper thigh ending roughly by the knee.
- 5) On September 7, 2018 at approximately 16:00 hours, Cahokia Motors sold a Black 2008 Dodge Charger to Taquita McCaster. Ms. McCaster lives at 324 Greystone Drive in Alorton Illinois 62207. Algernon Perkins is married to Taquita McCaster.
- 6) Cahokia Motors places GPS devices in their financed vehicles. The 2008 Dodge

Charger has a GPS devise within the vehicle.

- 7) On September 19, 2018, the Cash Store in Taylorville, Illinois within the Central District of Illinois, was robbed by two black males. The GPS located in the 2008 Dodge Charger identified the 2008 Dodge Charger at 11 E. North Street Taylorville, Illinois 62568; John Street, Taylorville, Illinois 62568; and 220 E. Pleasant Street Taylorville, Illinois 62568.
- 8) The Taylorville Cash Store is located at 119 West Park Street Taylorville, Illinois 62568. The Cash Store is less than half a mile from 220 E. Pleasant Street. The video surveillance from the Cash Store shows two black males enter the Taylorville store. The two black males speak with the Cash Store employee. Then the first black male jumps the counter. The second black male jumps the counter after the first black male. The first black male is wearing a white hat and holding a black pistol. The second black male is wearing a black hat and does not have a weapon. The first black male pointed the pistol to the clerk's head the entire time. As they exit, the black hat was left behind.
- 9) On September 29, 2018, at approximately 12:32 p.m., H.P. worked as an employee at the Cash Store located at 12547 Rt 143 in Highland, Illinois within Madison County within the Southern District of Illinois. H.P. stated that she heard the front door open and turned to assist the customer. H.P. stated that she saw a shorter, black male jump over the counter and display a black handgun. H.P. stated that the black male placed the handgun to her back and forced her to open the cash drawer and the safe. After taking the funds, the black male forced H.P. into the back of the store and into the bathroom. Once in the bathroom, H.P. called 911.


FURTHER YOUR AFFIANT SAYETH NAUGHT.



Matthew Inlow,
Special Agent, Bureau of Alcohol Tobacco Firearms

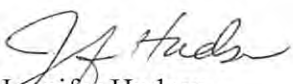
State of Illinois)
) SS.
County of St. Clair)

Sworn to before me and subscribed in my presence on the 5th day of October 2018, at
East St. Louis, Illinois.



STEPHEN C. WILLIAMS
United States Magistrate Judge

STEVEN WEINHOEFT
United States Attorney


Jennifer Hudson
Assistant United States Attorney

\$3915.00 in United States Currency was taken from the Cash Store.

- 10) Highland Police department arrived and began investigating. The Cash Store maintains its own, motion activated surveillance system. The video shows a black male wearing distinctive jeans entering the Cash Store. The jeans show a large rip on both upper thighs and creasing between the upper thighs and knee area.
- 11) Highland Police also contacted local businesses to determine if additional surveillance footage was available. The September 29, 2018 McDonald's restaurant surveillance video is clear. At 10:24 a.m., video shows a black male wearing a black hat, a black zip hoodie, a white t-shirt, necklace, ripped/torn blue jeans, and white tennis shoes entering the south entrance of the restaurant. After meeting Algernon Perkins on October 4, 2018 and viewing the McDonald's video, Affiant believes Algernon Perkins is the person in the McDonald's video. Additionally, the McDonald's video shows Perkins removing his cellular telephone. The cellular telephone home screen is visible on the video. During the course of Perkins' arrest on October 3, 2018, law enforcement again views Perkins' cellular telephone home screen. On October 3, 2018, law enforcement were able to compare the home screen on Perkins' cellular telephone with the home screen visible on the September 29, 2018 McDonald's video. The home screens appear the same. Finally, in the September 29, 2018 McDonald's video, Perkins left the McDonalds from the south doors turning west on Il-143. Moments later, a black Dodge Charger is seen travelling on IL 143.
- 12) GPS data records show that the 2008 Dodge Charger purchased by Taquita McCaster is in Highland, Illinois on September 29, 2018. The Dodge Charger is

first recorded stopping at 10:24 a.m. at 12548 IL-143 Highland, Illinois. The Dodge Charger last stops in Highland at 12:25 p.m, then returns to the Greystone apartment in Alorton, Illinois.

- 13) The Cash Store is located within an outdoor shopping center. Other stores include AT & T, Cricket Wireless, WalMart, and Domino's Pizza. At the time of the armed robbery, the Domino's Pizza surveillance video shows the 2008 Dodge Charger parked to the side of the Cash Store. At 12:31 p.m., the Dodge Charger leaves the shopping center and continues towards IL-143. Twenty seconds later, Highland dispatch received the 911 call from the Cash Store.
- 14) On October 3, 2018, the United States Marshals Service executed a parole violation warrant at 324 Greystone Apartment B in Alorton, Illinois. While there, Task Force Officer Jon Andrews recognized Perkins from the intelligence bulletin from Highland Police Department. Highland Police Department sought assistance identifying the suspect in their surveillance photographs. TFO Andrews recognized Perkins.
- 15) While at the residence, law enforcement located the ripped and creased jeans worn by the offender during the Salem and Highland robberies. Additionally, law enforcement found a rifle, but did not locate the black pistol.
- 16) On October 4, 2018, Affiant and Detective Brines met Perkins. After meeting Perkins, both Affiant and Brines reviewed the Salem Kentucky Fried Chicken video. Based upon the shape of Perkins' face and mouth and the distinctive jeans, Affiant and Brines identified Perkins as the customer in Kentucky Fried Chicken.
- 17) The Cash Store is a national business that engages in interstate commerce.